

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE
- - -

IN RE: VALSARTAN, : MDL NO. 2875
LOSARTAN, AND :
IRBESARTAN PRODUCTS : CIVIL NO.
LIABILITY LITIGATION : 19-2875
_____ : (RBK/JS)
:

THIS DOCUMENT APPLIES : HON. ROBERT
TO ALL CASES : B. KUGLER

- CONFIDENTIAL INFORMATION -
SUBJECT TO PROTECTIVE ORDER

VOLUME I
- - -

May 27, 2021
- - -

Videotaped remote deposition of
JUN DU, taken pursuant to notice, was
held via Zoom Videoconference, beginning
at 9:16 a.m., EST, on the above date,
before Michelle L. Gray, a Registered
Professional Reporter, Certified
Shorthand Reporter, Certified Realtime
Reporter, and Notary Public.

- - -
GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

1 please?

2 MR. GOLDBERG: No. Let's go
3 off the record for a second.

4 MR. SLATER: Off the record.

5 THE VIDEOGRAPHER: The time
6 right now is 9:44 a.m. We are off
7 the record.

8 (Short break.)

9 THE VIDEOGRAPHER: The time
10 right now is 9:45 a.m. We are
11 back on the record.

12 BY MR. SLATER:

13 Q. Looking at the page where
14 the last two Bates numbers are 66.
15 There's a page titled "Company
16 Relationship."

17 Do you see that?

18 A. Yes.

19 Q. At the top of this
20 organization chart, the top left is ZHP,
21 correct?

22 A. On the top left corner of
23 this slide, that is correct.

24 Q. What is your title with ZHP,

1 what position do you hold?

2 A. My title with ZHP is the
3 vice chairman of the board of directors.

4 Q. Do you report to anybody at
5 ZHP?

6 A. I am only held responsible
7 to the chair of the board of directors.

8 Q. Who is that?

9 A. What time frame are you
10 referring to?

11 Q. Right now.

12 A. It's Hong Li spelled as
13 H-O-N-G, last name L-I.

14 Q. Prior -- rephrase.
15 When did you begin to --
16 rephrase.

17 Prior to Hong Li, who did
18 you report to?

19 A. It was Jianxin Tong, spelled
20 as J-I-A-N-X-I-N, last name T-O-N-G.

21 Q. Who did you report to before
22 Mr. Tong?

23 A. It was Baohua Chen, spelled
24 as B-A-O-H-U-A, last name C-H-E-N.

1 Q. Looking now at the exhibit,
2 under the Company Relationship heading,
3 it says, "ZHP and other investors were
4 the owners of PrinJohnson BioPharm."

5 Do you see that?

6 A. Yes.

7 Q. Who are the other investors?

8 A. Over here there are external
9 investors for the Series A and Series B
10 financing, as well as individual
11 investors on the management team at
12 PrinJohnson.

13 Q. Who are the private
14 investors?

15 A. I did not catch your
16 question.

17 Q. You said there were private
18 investors among the other investors in
19 PrinJohnson. Who were those private
20 investors?

21 A. For Series A there was a
22 private investor called Key Weight. For
23 Series B, there was a private investor
24 called Milestone.

1 knowledge.

2 Q. What is PrinJohnson
3 BioPharm, what is its function as a
4 company?

5 A. PrinJohnson BioPharm is a
6 company incorporated in Cayman Islands.
7 It is merely a hosting company.

8 Q. What is a hosting company,
9 what does that mean?

10 A. What it means is that it
11 owns two companies that do business.
12 However, itself does not conduct any
13 business activities.

14 Q. Does PrinJohnson BioPharm
15 maintain bank accounts in the Cayman
16 Islands?

17 A. No.

18 Q. Does PrinJohnson BioPharm
19 maintain any bank accounts?

20 A. Yes.

21 Q. Where?

22 A. They used to have a bank
23 account in Hong Kong.

24 Q. When you say they used to,

1 why do you say in the past tense?

2 A. That is because, to the best
3 of my recollection, this account was
4 closed too.

5 Q. Does PrinJohnson have any
6 bank accounts currently?

7 A. Yes.

8 Q. Where?

9 A. It's the New York branch of
10 Bank of China.

11 Q. According to this corporate
12 organization chart on the screen,
13 PrinJohnson owns two companies, one of
14 which is Prinbury BioPharm; is that
15 correct?

16 A. That is correct.

17 Q. What does Prinbury --
18 rephrase.

19 What does Prinbury BioPharm,
20 what is the function of that company?

21 A. It is a finished dose
22 product development company.

23 Q. Where is it located?

24 A. In Shanghai.

1 Q. This chart shows that
2 PrinJohnson BioPharm also owns Prinston
3 Pharmaceutical. What is the function of
4 Prinston Pharmaceutical?

5 A. Prinston Pharmaceutical
6 Company engages in the finished dose
7 products, research and development, as
8 well as the regulatory affairs of such
9 products. It owns an ANDA, A-N-D-A, of
10 generic drugs. It also owns a sales
11 company and manufacturing facility or
12 facilities.

13 Q. Do you hold any titles with
14 Prinston Pharmaceuticals?

15 A. That is correct.

16 Q. What title or titles do you
17 hold with Prinston?

18 A. CEO.

19 Q. Have you held any other
20 titles with Prinston Pharmaceutical other
21 than CEO?

22 A. No.

23 Q. Have you held any titles
24 with Prinbury BioPharm?

1 A. I am the legal
2 representative of Prinbury BioPharm. I
3 used to be their CEO a while.

4 Q. Have you held any titles
5 with PrinJohnson BioPharm?

6 A. Yes.

7 Q. What title do you hold with
8 PrinJohnson BioPharm?

9 A. CEO.

10 Q. Have you ever held any other
11 titles with PrinJohnson BioPharm other
12 than CEO?

13 A. I'm also on the board of
14 directors.

15 Q. This chart shows that
16 Princeton Pharmaceutical is the
17 100 percent owner of Solco Healthcare.
18 What is Solco Healthcare?

19 A. Solco Healthcare is a
20 company that sells the generic drugs of
21 Princeton for which Princeton holds the
22 ANDA.

23 Solco Healthcare also sells
24 some of the generic drugs from third

1 parties.

2 Q. Does Solco have any
3 manufacturing operations?

4 A. No.

5 Q. Do you hold any titles with
6 Solco Healthcare?

7 A. That is correct.

8 Q. What title or titles do you
9 hold with Solco?

10 A. CEO.

11 Q. Have you held any other
12 titles with Solco at any time?

13 A. No.

14 Q. Does Hai Wang report to you
15 at Solco?

16 A. Hai Wang as the general
17 manager of Solco is in charge of the
18 daily operations of Solco.

19 Q. Does Hai Wang report to you
20 at Solco?

21 A. That is correct, however at
22 high level.

23 Q. Does Hai Wang report to you
24 at Princeton?